

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
vs.) No. 04-30034-MAP
)
MICHAEL CROOKER)

MOTION IN LIMINE

Now comes Michael Crooker, defendant in the above entitled indictment, by and through counsel, and moves this Honorable Court for an order in limine pursuant to Fed. Rules Crim. Pro. Rule 609 and 403 preventing the Government from introducing at trial defendant's prior convictions for certain crimes and asserts as his basis therefore the following;

He has been convicted of a series of crimes which upon information and belief the Government intends to introduce at trial should be elect to testify on his won behalf. The defendant believes certain convictions are time barred pursuant to Rule 609 (b), do not involve dishonesty or false statements, or are so closely related to the crime charged herein as to be unduly prejudicial pursuant to Rule 403.

WHEREFORE, the defendant moves the court for an order in limine preventing the Government from introducing said convictions at trial.

Respectfully submitted,

THE DEFENDANT

BY: /s/ Vincent A. Bongiorno

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CERTIFICATE OF SERVICE

I, Vincent A. Bongiorni, Esq., do hereby certify that I have served a copy of the foregoing via CM/ECF to Assistant United States Attorney Kevin O'Regan, 1550 Main Street, Springfield, MA 01103 this 6th day of July 2006.

/s/ Vincent A. Bongiorni

Vincent A. Bongiorni